C, DUKES SCOTT EXECUTIVE DIRECTOR

NANETTE S. EDWARDS DEPUTY EXECUTIVE DIRECTOR

Phone: (803) 737-0800 www.regulatorystaff.sc.gov

jnelson@regstaff.sc.gov

Jeffrey M. Nelson Chief Counsel & Director of Legal Services

August 23, 2017

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

Re: Request for Certification of the Use of Universal Service Funds Pursuant to 47 C.F.R. 54.314 and Telecommunications Act Section 254(e), Federal Communications Commission CC Docket No. 96-45 (2016); and Annual Reports for ETC (High Cost ETCs) **Docket No. 2017-14-C**

Dear Ms. Boyd:

The South Carolina Office of Regulatory Staff (ORS) has reviewed the various Competitive ETC filings made in this Docket and pursuant to Commission Regulations 103-690.1.B. (a) presents the following report.

FTC Communications, Inc. d/b/a FTC Wireless ("FTC Wireless") is the only remaining wireless carrier receiving <u>high cost</u> support. ORS has received and reviewed the Annual Report information and FFC 481 report filed by FTC Wireless.

In its report FTC Wireless provided information related to its operations for the year 2016 the report indicates that the federal support received by it is being used for the provision, maintenance and upgrading of facilities and services for which the support is intended.

Additionally, Mr. Jeffrey Lawrimore, Chief Financial Officer for FTC Communications, LLC filed an Affidavit with the Public Service Commission of South Carolina certifying that all the federal high cost support provided to FTC Wireless was used during the preceding year and

Letter - Jocelyn G. Boyd, Esquire August 23, 2017 Page 2 of 2

will be used in the coming year, only for the provision, maintenance, and upgrading facilities and services for which such support is intended.

ORS has also reviewed the filings of the other active CETCs having ETC designation which participate in the Low Income Federal program. These filings included responses filed pursuant to State and Federal requirements. All CETCs filed copies of the FCC Form 481 and responded to Commission Regulation 103 - 690.1 as required. With regard to the wireless CETCs, the companies' responses were for the most part the same. The ORS did note a difference in the wireless CETCs response to 103-690.1.B. (b) (7).

Regulation 103-690.1.B. (b) (7) indicates that ETCs designated after January 1, 2007 shall file for non-incumbent local exchange carriers certification that the carrier is offering a local plan comparable to that offered by the incumbent local exchange carrier in the relevant service areas. Most wireless carriers provided a certification and explanation addressing the comparability of their usage plans with the incumbent Local Exchange Carrier's plan. However, in the filings made by Boomerang Wireless, Telrite Corporation, TAG Mobile, Blue Jay Wireless, Tempo Telecom, and American Broadband and Telecommunications Company indicate that this section does apply to them because they operate as wireless ETCs. The ORS is unaware of any ruling by the Commission indicating that this requirement is not applicable to wireless carriers. While this finding may be inconsequential with regard to the carrier offering of supported services to the consumers of South Carolina, ORS feels it is appropriate to bring this matter to the Commission's attention.

Thank you for your consideration in this matter and please do not hesitate to contact me if you have any concerns regarding the matter above.

Sincerely,

Jeffrey M. Nelson